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Attorneys for Defendants  
CHUBB & SON, a division of FEDERAL INSURANCE COMPANY  
and VIGILANT INSURANCE COMPANY

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

WINERY ASSET MANAGEMENT, INC., a  
California corporation,

Plaintiff,

v.

CHUBB & SON, a division of FEDERAL  
INSURANCE COMPANY, VIGILANT  
INSURANCE COMPANY, and DOES 1 through  
100, inclusive,

Defendants.

CASE NO. C-06-3605 MMC

**STIPULATION REGARDING  
EXTENSION OF TIME TO SERVE  
INITIAL DISCLOSURES PURSUANT  
TO FEDERAL RULES OF CIVIL  
PROCEDURE, RULE 26(a)(1);  
~~PROPOSED~~ ORDER**

Date Action Removed: June 6, 2006

Trial Date: Not set

Discovery Cutoff: Not set

Plaintiff Winery Asset Management, Inc. ("WAMI") and Defendants Chubb & Son, a division of Federal Insurance Company and Vigilant Insurance Company (collectively "Vigilant") hereby stipulate, through their respective counsel of record, as follows:

1. The Court has set a Case Management Conference date of September 8, 2006. Pursuant to Federal Rules of Civil Procedure, Rule 26(a)(1), WAMI and Vigilant (collectively "Parties") believe that the deadline for serving initial disclosures is September 1, 2006.

2. Pursuant to Local Civil Rule 6-2, the Parties request that the Court allow a three-week extension of time to serve initial disclosures pursuant to Rule 26(a)(1), such that the deadline for serving initial disclosures pursuant to Rule 26(a)(1) would be September 22, 2006.

1 The Parties believe that an extension will allow the Parties time to explore settlement of the  
2 instant action. WAMI has advised Vigilant that WAMI believes that an extension will allow it  
3 additional time to conduct its investigation and prepare its initial disclosures.

4 3. There have been no prior extensions of time in the instant action.

5 4. The Parties do not believe that the requested extension would impact the schedule  
6 for the instant action.

7 5. The Parties further stipulate that the instant Stipulation may be executed in  
8 counterparts.

9 Dated: September 1, 2006

CARLE, MACKIE, POWER & ROSS

11 By: 

12 Dawn M. Ross  
13 Gregory J. Walsh  
14 Attorneys for Plaintiff WINERY ASSET  
MANAGEMENT, INC.

15 Dated: September 1, 2006

TRESSLER, SODERSTROM, MALONEY & PRIESS,  
LLP

17 By: 

18 Paul S. White  
19 Rina Carmel  
20 Attorneys for Defendants  
21 CHUBB & SON, a division of FEDERAL  
INSURANCE COMPANY  
22 and VIGILANT INSURANCE COMPANY

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24 DATED: September 1, 2006

26   
27 UNITED STATES DISTRICT JUDGE

28 LA 92083 (2246-68)